

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Case No. 1:22-cv-10904-JSR

**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS’
NOTICE OF MOTION TO COMPEL DISCOVERY RESPONSES
CONCERNING TEMPORAL SCOPE AND DOCUMENT CUSTODIAN**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff, the Government of the United States Virgin Islands (“Government”), respectfully moves for an Order compelling Defendant JPMorgan Chase Bank, N.A. (“JPMorgan”) to provide discovery responses covering the full temporal scope of the Government’s claims through 2019 and documents for custodian James Dimon. The reasons in support of the Government’s motion are set forth in the Memorandum of Law filed herewith. As directed in this Court’s February 23, 2023 email confirming decisions on the parties’ discovery applications made during the February 22, 2023 telephone call with the Court, the Government’s motion and supporting Memorandum of Law are submitted before “5:00 PM today.” Pursuant to the same email, JPMorgan’s opposition is due by 5:00 PM on February 28, 2023, and there will be no reply and no oral argument. *Id.*

Dated: February 23, 2023

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